

Construction Safety and Health Policy (Contractor's policy)

A. **SAFETY AWARENESS:** Safety is a top priority. As a contractor (hereinafter variously referred to in either the first person or the "contractor" or the "company" or the owner/operator or employer), I believe a safety and health program will effectively eliminate or control work related hazards faced by myself and company employees. The success of this safety program hinges on clearly stated work rules, regularly scheduled and informative safety and training meetings, a thorough self-auditing program, and the assistance and cooperation of all employees. All employees must follow the standards and company work rules. A progressive disciplinary policy will be enforced as part of this program.

ADHERENCE TO THE SAFETY AND HEALTH PROGRAM SHOULD MINIMIZE THE RISK OF INJURY.

B. **RESPONSIBILITY FOR SAFETY:** Everyone at the job site is responsible for safety. Everyone must take the obligation seriously. Unsafe work practices, acts or conditions will not be tolerated. Safety is never to be compromised for production.

1. In order for a contractor to provide safe and healthful employment, everyone must:
 - a. comply with all federal, state and local laws and regulations;
 - b. use good judgment and safe practices on all jobs; and
 - c. comply with the company Safety and Health Program and Work Rules.
2. As a contractor, I am specifically responsible for:
 - a. fostering a work environment where safety and health are paramount;
 - b. ensuring that employees are afforded the training necessary to maintain a safe and healthful work site;
 - c. implementation of the company's safety and health program;
 - d. monitoring and requiring compliance with the company Safety and Health program, Work Rules and OSHA standards.
 - e. providing necessary personal protective equipment;
 - f. ensuring that supplies and equipment purchased by the company comply with safety standards;
 - g. ensuring that equipment provided by employees complies with OSHA safety standards and company safety standards and work rules; and
 - h. maintaining records of employee training and as required by OSHA.
3. Job Supervisors and subcontractors are specifically responsible for:
 - a. monitoring and requiring compliance with company Safety and Health Program, Work Rules and OSHA standards.
 - b. ensuring that proper safety equipment is available and used appropriately;
 - c. conducting job-site inspections, safety meetings, training and supervision, as needed, during work hours;
 - d. correcting hazards and unsafe practices;
 - e. obtaining medical attention for injured employees as quickly as possible, and initiating First Responder intervention and Emergency Evacuation Procedures, as appropriate.
4. Employees of the contractor and sub-contractors are specifically responsible for:
 - a. complying with all safety and health standards and regulations;
 - b. complying with all company work rules;
 - c. actively participating in safety and health training;
 - d. requesting assistance and supervision as needed;
 - e. using and maintaining all owned equipment in accordance with OSHA safety standards, company safety standards and company work rules;
 - f. using and maintaining personal protective equipment;

- g. reporting all observed unsafe acts, practices or conditions; and
- h. correcting unsafe acts, practices or conditions within their immediate work area.

- C. Safety and Health Consultants and Insurance Safety Advisor: The company may retain the services of a safety and health consultant and/or insurance safety advisor to conduct on-site inspection of all operations, conduct a safety meeting and be available for consultation with employees. These individuals shall also meet with the owner/operator, foreman, and supervisors to review workplace safety and health issues, including all written reports.

Written reports made by these individuals will be maintained in the company files.

- D. ORIENTATION: The company shall neither request nor permit an employee to begin work, or to begin a new task within the company, until the employee has been oriented to the job and has demonstrated the skill and work techniques necessary to do the job safely.

Each employee shall have a personal copy of the safety and health program; a copy of the OSHA safety standards applicable to a particular construction standard; and a copy of the work rules available to them. The copies will be made available or communicated in the employee's native language. Each employee shall demonstrate an understanding of each of these documents.

- 1. All employees will have the opportunity to ask questions and receive:
 - a. a detailed description of the job tasks assigned and the proper techniques for performing them;
 - b. detailed instruction on the proper use and maintenance of personal protective equipment;
 - c. training for identification of hazards and corresponding safety standards and work rules; and
 - d. on-site inspection to ensure technical competence and safety awareness. The determination of competence and awareness shall be made by the foreman and safety director in consultation.

- E. TRAINING: The employer shall provide training for each employee, including supervisors, at no cost to the employee.

- 5. Training shall be provided as follows:
 - a. As soon as possible for initial training for each current and new employee;
 - b. Prior to initial assignment for each new employee;
 - c. Whenever the employee is assigned new work tasks, tools, equipment, machines or vehicles; and
 - d. Whenever an employee demonstrates unsafe job performance.
- 4. At a minimum, training shall consist of the following elements:
 - a. Safe performance of assigned work tasks;
 - b. Safe use, operation and maintenance of tools, machines and vehicles which the employee uses or operates, including emphasis on understanding and following the manufacturer's operating and maintenance instructions, warnings and precautions.
 - c. Recognition of safety and health hazards associated with the employee's specific work tasks, including the use of measures and work practices to prevent or control those hazards.
 - d. Recognition, prevention and control of other safety and health hazards for the particular job; and

- e. Procedures, practices and requirements of the employer's work site.
- f. The employer shall train each current and new employee in those elements for which the employee has not received training.
- g. The employer is responsible for ensuring that each current and new employee can properly and safely perform the work tasks and operate the tools, equipment, machines, and vehicles used in their job.
- h. The company shall provide training to employees at the time of their initial hire and at least annually thereafter. Training will also be provided whenever a change in job assignment will expose the employee to new hazards. This training shall occur before the employee starts the work for which the training is required.
- i. At a minimum, employees shall be trained to recognize safety hazards associated with their individual work tasks, and the preventive and protective measures to deal with such hazards. The training provided by the company shall also give employees the information necessary to recognize and control safety hazards at the job site generally.
- j. Employees shall demonstrate the ability to perform the tasks of their job.
- k. All new and inexperienced employees and current employees unfamiliar with a new assignment shall be under the close guidance of the owner/operator or a supervisor until it is determined by the owner/operator or supervisor that those employees are able to work in a safe manner.
- l. Training shall be obtained through a safety consultant, insurance safety person or any other equally qualified person. Training shall be provided in all areas in the Safety and Health Program and Work Rules where applicable including, but not limited to:
 - i) Hazard Communications Program
 - ii) First Aid
 - iii) Electrical safety
 - iv) Scaffolding
 - v) Fall Protection
 - vi) Machine/Skidder Operation
 - vii) Bloodborne Pathogens
 - viii) Personal Protective Equipment
 - ix) Noise Abatement
 - x) Hazard Identification
 - xi) Hazardous Environmental Conditions
 - xii) Lock Out/Tag Out
 - xiii) Emergency Communication and Evacuation

F. **SAFETY TEAM:** The success of any accident prevention program depends on the cooperation and active support of all employees as well as the owner/operator.

- 1. A safety team shall be organized for each job. A safety team facilitates employee participation in the safety program and hazard identification. The safety team shall include the owner/operator, one employee from each job classification, foreman and a supervisor.
- 2. The safety team shall review accident investigation reports, and may make recommendations on eliminating unsafe conditions and practices. The team may also recommend safety standards, work rules and training.
- 3. The safety team shall meet prior to the start of the project and at regular intervals during the

project as needed.

G. SAFETY MEETINGS: A safety meeting will be held at least weekly. All employees must attend safety meetings.

1. Safety meetings will be between thirty and forty-five minutes in duration, or longer if necessary to cover the subject matter of the meeting, and shall be conducted by the owner/operator, foreman or other qualified individual who, because of particular expertise, is qualified to teach the subject matter of the meeting.
2. An agenda will be available in advance of each safety meeting. All accidents and significant near misses shall be discussed at safety meetings. Written materials will be provided to employees as an aid to understanding the subject covered in the meeting. Minutes of each safety meeting will be taken and distributed to employees at the next meeting.
3. Employees are expected and encouraged to actively participate during safety meetings. Employees are also encouraged to identify topics to be covered in safety meetings. All employees present at the work site shall attend the safety meeting, and failure to do so shall be deemed a violation of company safety standards and will result in that employee being disciplined under the disciplinary program described herein.

H. SAFETY STANDARD AND WORK RULE ENFORCEMENT

Compliance with safety standards, the safety and health program and work rules is a condition of employment. An employee who fails to comply with safety standards or work rules shall be disciplined as follows:

1. First Violation: Verbal warning to the employee, along with instruction explaining the violation.
2. Second Violation: Written warning explaining the violation. The employee's supervisor and the owner/operator shall counsel the employee in an effort to avoid a recurrence of the same or a similar violation.
3. Third Violation: Suspension for one (1) week. A counseling meeting will be held with the employee, the owner/operator and the employee's supervisor. The employee shall submit a written statement demonstrating understanding of the safety standard or work rule violated, as well as what the employee intends to do in the future to ensure compliance. The written statement must be provided to the company before the employee will be allowed to commence work again.
4. Fourth Violation: Termination.
5. Flagrant, egregious or intentional violations of a safety standard or work rule may result in immediate termination.
6. The progressive disciplinary policy established by the Safety and Health Program does not alter or limit the company's right to terminate the employment relationship at any time for any reason. All employees are employees at will.
7. A written record, dated and signed by the employee, the employee's supervisor and the safety director shall be prepared and maintained for each violation of a safety standard or work rule.

I. REPORTING UNSAFE ACTS, CONDITIONS AND SIGNIFICANT NEAR MISSES 1. All observed unsafe acts, conditions and near misses must be reported to the owner/operator, foreman or supervisor. Failure to report such incidents or conditions results in the loss of valuable information that could prevent a serious accident or property damage in the future.

2. Investigations shall be conducted in accordance with the provisions of this safety and health program.

J. HAZARD IDENTIFICATION

1. OSHA safety standards provide the basic safety requirements. Hazard identification is a continuous process, however, and all employees, supervisors and management must watch for and correct unsafe conditions. Safety standards and work rules shall be expanded as needed in accordance with ongoing hazard identification.

2. The company shall conduct on-site inspections, records reviews and accident investigations as part of its hazard identification program. The company believes that employee feedback on existing safety standards and work rules is important, and such feedback is encouraged.
3. Modification or deletion of a company safety standard or work rule shall be made only after consultation with a safety consultant and/or with OSHA

K. ON-SITE INSPECTIONS

1. The company shall conduct on-site inspections of all work operations. On-site inspections will be conducted at least twice weekly by the owner/operator, foreman or supervisor.
2. The purpose of these inspections is to ensure compliance with OSHA safety standards by employees and sub-contractors, company safety standards, and company work rules.
3. When conducting inspections, the owner/operator, foreman, or supervisor shall identify hazards and problems at the work site to ensure that existing safety standards and work rules are adequate to ensure a safe work site.
4. Inspections will include a work site review, personal protective equipment review, review of the skill and technique of each employee and an equipment/machine review. The checklist attached hereto shall be used as a guide when conducting on-site inspections.
5. A written report of on-site inspections shall be made available to employees. These records shall be maintained by the employer.

L. INVESTIGATION OF ACCIDENTS AND NEAR MISSES

1. An accident is an undesired event that results in injury or property damage.
2. All accidents and near misses must be reported immediately to the owner/operator, foreman, or supervisor. The owner/operator, foreman or supervisor shall conduct an on-site analysis and inspection of each accident and near miss. Investigations shall be conducted by using the attached form. A written report of the investigation shall be prepared and signed by the owner/operator, foreman, or supervisor, and shall be maintained by the company.
3. All investigation reports shall be discussed at the next occurring safety meeting.

M. FIRST AID KITS

1. First aid supplies shall be easily accessible when required.
2. The owner/operator, foreman, shall ensure the availability of medical personnel and prompt medical attention in the case of serious injury.
3. Remote locations: A person who has a valid certificate in first-aid training from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence, shall be available at the worksite to render first aid.
4. The owner/operator shall train designated first aid providers in the hazards of bloodborne pathogens.
5. The owner/operator shall provide containers for the collection and separation of waste generated from rendering medical assistance.
6. The contents of the first aid kit shall be placed in a weatherproof container with individual sealed packages for each type of item, and shall be checked by the employer before being sent out on each job and at least weekly on each job to ensure that the expended items are replaced.
7. Equipment for prompt transportation of the injured person to a hospital, or a communication

system for contacting necessary ambulance service, shall be provided.

8. In areas where 911 is not available, the telephone numbers of the physicians, hospitals, or ambulances shall be conspicuously posted.
9. Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.